

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, and the
Communications Workers of America,
*On behalf of themselves and other
similarly situated individuals,*

Court File No. 20-cv-01302-WMW-
DTS

Plaintiffs,

v.

**DECLARATION OF JON
SCHLEUSS**

City of Minneapolis; Minneapolis
Chief of Police Medaria Arradondo *in
his individual and official capacity*;
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity*; Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and
official capacity*; Minnesota State
Patrol Colonel Matthew Langer, *in his
individual and official capacity*; John
Does 1-2, *in their individual and
official capacities*,

Defendants.

JON SCHLEUSS declares and states as follows:

1. The Communications Workers of America (“CWA”) is an international labor union representing over 700,000 workers in a broad range of industries, including print and broadcast news media, telecommunications, airline, manufacturing, education, public service, and healthcare, among others. CWA’s central purpose is protecting

the rights of workers through collective bargaining and public advocacy. CWA's headquarters is in Washington, DC; its members work and live throughout the United States, including Minnesota. CWA is comprised of multiple sectors and districts representing members in different industries.

2. I am the President of the NewsGuild-CWA ["NewsGuild-CWA"], a sector of CWA, and thereby a Vice President of CWA. The NewsGuild-CWA represents journalists, photojournalists and other media workers across America. Our members include many on the reporting staff of the Los Angeles Times, the Chicago Tribune, the Detroit Free Press, the Denver Post, Reuters, the Associated Press, the Washington Post, the New York Times, the St. Paul Pioneer Press, and the Minneapolis Star Tribune, among others. The NewsGuild-CWA has over 14,000 dues paying members in the United States (including freelance reporters, retirees and people working in social justice organizations) and represents more than 15,000 journalists in the United States.
3. The chart attached as Exhibit A to this Declaration lists U.S. newspapers, news magazines, news services and digital media where

the NewsGuild-CWA has collective bargaining rights on behalf of reporters and other members of the news media.

4. Many of the individual reporters and photojournalists affected by police violence and intimidation against the news media at the Minneapolis George Floyd protests are represented by our organization, including all of the Star Tribune journalists mentioned by name in the Complaint.
5. Because some of our affected members, and their news organizations, report on the Minneapolis Police and Minnesota State Patrol as part of their journalism, ethical considerations that guide news reporting make directly suing those organizations as individual plaintiffs complicated if not impossible. We are joining the lawsuit to advance the constitutional rights of those directly affected members affected by the police violence and unlawful arrest, and to protect the First Amendment rights of our other members, who have suffered a chilling effect because of the Minneapolis Police Department and Minnesota State Patrol's unconstitutional and violent conduct.
6. Article I, Section 2 of the NewsGuild-CWA Constitution provides:

SECTION 2. The purpose of the Guild shall be to advance the economic interests and to improve the working conditions of its members; to guarantee, as far as it is able, equal employment and advancement

opportunity in the industry and constant honesty in news, editorials, advertising, and business practices; to raise the standards of journalism and ethics of the industry; to foster friendly cooperation with all other workers; and to promote industrial unionism in the jurisdiction of the Guild.

And Article III of the CWA Constitution likewise provides:

The objects of the Union shall be:

(a) To unite the workers within its jurisdiction in a single cohesive labor union for the purpose of collective effort;

(b) To improve the conditions of the workers with respect to wages, hours, working conditions and other conditions of employment;

(c) To disseminate information among the workers respecting economic, social, political and other matters affecting their lives and welfare;

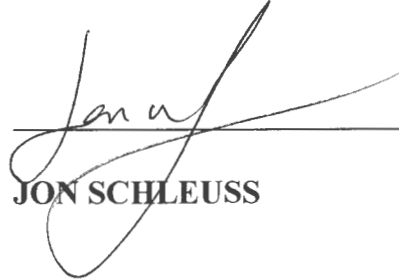
(d) To advance the interests of the workers by advocating the enactment of laws beneficial to them and the defeat or repeal of laws detrimental to them;

(e) To do all things which may be necessary or proper to secure for the workers the enjoyment of their natural rights.

7. These foundational provisions of the international labor union and its sector Constitutions undergird CWA's participation in this lawsuit. Essentially they provide that all CWA members, including NewsGuild-CWA members, agree to work together, through the auspices of their union, to ensure that members work under safe and lawful conditions.

**I declare under penalty of perjury under the laws of United States of America
that the foregoing is true and correct to the best of my knowledge.**

Dated: June 2020



JON SCHLEUSS